UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK		
UNITED STATES OF AMERICA, ex rel. ALEX GRABCHESKI,	X : :	
Plaintiff,	:	
-against-	:	10 Civ. 3902 (GBD)
AMERICAN INTERNATIONAL GROUP, INC.,	:	
nvc.,	:	
Defendant.	:	
	X	

NOTICE OF MOTION

PLEASE TAKE NOTICE that, upon the annexed Declaration of Max Maccoby, dated March 25, 2015, and the accompanying Combined Memorandum (1) in Support of Motion for Leave to File Third Amended Complaint and (2) in Opposition to Defendant's Motion to Dismiss the Second Amended Complaint, the undersigned will move this Court before the Honorable George B. Daniels, in Room 11A of the United States Courthouse for the Southern District of New York, 500 Pearl Street, New York, New York 10007, on such date and at such time at the Court sets, for an order, pursuant to Rule 15(a) of the Federal Rules of Civil Procedure, granting Plaintiff/Relator Alex Grabcheski's motion for leave to file the proposed Third Amended Complaint, and granting such other and further relief as the Court deems just and proper. Oral argument, if directed, will occur on such a date and time as the Court determines.

PLEASE TAKE FURTHER NOTICE, that answering papers, if any, shall be served on or before 45 days after service of this Motion. Any reply papers shall be served on or before 30 days after service of any answering papers.

Respectfully submitted,

Dated: Washington, D.C.

March 25th, 2015.

BUTZEL LONG, a professional corporation

By: /s/ Max Maccoby

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Attorneys for Defendant American International Group, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 25th day of March, 2015, the foregoing Notice of Motion and the accompanying Declaration of Max Maccoby and Combined Memorandum (1) in Support of Motion for Leave to File Third Amended Complaint and (2) in Opposition to Defendant's Motion to Dismiss the Second Amended Complaint was served on the following via the Court's ECF system:

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and on the following by email (pursuant to written consent to electronic service):

Pierre Armand, Esq. Assistant United States Attorney United States Attorney's Office Southern District of New York 86 Chambers Street New York, N.Y. 10007 Pierre.Armand@usdoj.gov

/s/ Max Maccoby

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